

United States Bankruptcy Court
Western District of Washington

In re:
Vicky J Brown
Debtor

Case No. 15-14277-CMA
Chapter 7

CERTIFICATE OF NOTICE

District/off: 0981-2

User: sharona
Form ID: pdf

Page 1 of 1
Total Noticed: 18

Date Rcvd: Nov 25, 2015

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Nov 27, 2015.

db +Vicky J Brown, 20410 120th Ave SE, Kent, WA 98031-1630
cr +HTD Leasing LLC, c/o Marshall & Weibel, P.S., 720 Olive Way, #1201,
Seattle, WA 98101-3809
sr +Shadow Hawk I Condominium Owners Association, c/o Condominium Law Group, PLLC,
10310 Aurora Ave. N., Seattle, WA 98133-9228
sr +Wells Fargo Bank, N.A., RCO Legal, P.S., c/o James Miersma, 13555 SE 36th St.,
Suite 300, Bellevue, WA 98006-1489
cr +Wells Fargo Bank, N.A., RCO Legal, PS, c/o Jennifer L. Aspaas,
13555 SE 36th St., Suite 300, Bellevue, WA 98006-1489
955542399 +AES, PO Box 2461, Harrisburg, PA 17105-2461
955542401 +BECU Recovery Dept, PO Box 97050, MS 1049-1, Seattle, WA 98124-9750
955542402 +Chase AARP, PO Box 94014, Palatine, IL 60094-4014
955542403 +Equifax, PO Box 740241, Atlanta, GA 30374-0241
955542404 +Experian, PO Box 4500, Allen, TX 75013-1311
955542405 +Ford Credit, PO Box 552679, Detroit, MI 48255-2679
955542406 +Key Bank, 13933 Petrovitsky Rd., Renton, WA 98058-6802
955542407 +Saba & Associates, 19735 10th Ave. NE S301, PO Box 1784, Poulsbo, WA 98370-0240
955542408 +Transunion, 555 W Adams St, 7th Fl, Chicago, IL 60661-5753
955542409 +Wells Fargo Home Mortgage, PO Box 14411, Des Moines, IA 50306-3411

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
sr E-mail/PDF: gecsed@recoverycorp.com Nov 26 2015 01:28:21 Synchrony Bank,
Recovery Management Systems Corporation, c/o Ramesh Singh, 25 SE 2nd Ave #1120,
Miami, FL 33131-1605
955542400 E-mail/Text: ecf@becu.org Nov 26 2015 01:26:54 BECU, Card Services, PO Box 84707,
Seattle, WA 98124-6007
955607471 E-mail/PDF: rmsced@recoverycorp.com Nov 26 2015 01:27:40
Recovery Management Systems Corporation, 25 S.E. 2nd Avenue, Suite 1120,
Miami, FL 33131-1605

TOTAL: 3

***** BYPASSED RECIPIENTS (undeliverable, * duplicate) *****
r Kailee Rainey

TOTALS: 1, * 0, ## 0

Addresses marked '+' were corrected by inserting the ZIP or replacing an incorrect ZIP.
USPS regulations require that automation-compatible mail display the correct ZIP.

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 9): Pursuant to Fed. R. Bank. P. 2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Nov 27, 2015

Signature: /s/Joseph Speetjens

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on November 24, 2015 at the address(es) listed below:

James K Miersma on behalf of Creditor Wells Fargo Bank, N.A. ecf@rcolegal.com,
RCO@ecf.inforuptcy.com
James K Miersma on behalf of Special Request Wells Fargo Bank, N.A. ecf@rcolegal.com,
RCO@ecf.inforuptcy.com
Katie A Axtell on behalf of Creditor HTD Leasing LLC kaxtell@bwmlegal.com,
bankruptcy@bwmlegal.com
Nancy L James njames@epitrustee.com, njames@ecf.epiqsystems.com
Richard J Welt on behalf of Debtor Vicky J Brown rwelt@mbs-law.com, msimon@mbs-law.com
Rory C Livesey on behalf of Trustee Nancy L James rory@liveslaw.com, patti@liveslaw.com
Stephen M Smith on behalf of Special Request Shadow Hawk I Condominium Owners Association
stephen@condolaw.net
United States Trustee USTPRegion18.SE.ECF@usdoj.gov

TOTAL: 8

Honorable Christopher M. Alston
Hearing date: December 18, 2015; 9:30 a.m.
Hearing Place: Room 7206, 700 Stewart Street, Seattle, WA 98101
Responses due by: December 11, 2015; by 4:30 p.m.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:) Chapter 7
) Bankruptcy No. 15-14277
VICKY J. BROWN,)
a/k/a Victoria J. Brown,)
) NOTICE OF MOTION FOR SALE OF
) REAL PROPERTY OF THE ESTATE
Debtor(s).) FREE AND CLEAR OF LIENS AND
) ENCUMBRANCES

TO: Vicky Brown, and her attorney of record, creditors, and parties of interest.

PLEASE TAKE NOTICE that the Motion for Sale of Real Property of the Estate Free and Clear of Liens and Encumbrances will be heard on the 18th day of December, 2015, at 9:30 a.m., at the United States Courthouse, 700 Stewart Street, Seattle, Washington, in Room 7206, and the clerk is requested to note the motion on the motion docket for that day.

YOU ARE FURTHER NOTIFIED that responses or objections must be made in writing and the original filed with the Bankruptcy Court at the United States Courthouse, Room 6301, 700 Stewart Street, Seattle, Washington 98101. Copies must be served upon the United States Trustee's Office at the United States Courthouse, Room 5103, 700 Stewart Street, Seattle, Washington 98101, the above-named Judge and the undersigned attorney on or before December 11, 2015. Failure to comply with the local rule may be deemed by the court as opposition without merit. If responsive pleadings are not filed as stated above, the hearing may be stricken and an order granting the relief requested in the motion may be presented *ex parte*.

The trustee, Nancy James, has filed a motion for sale of real property as follows:

Street address of property to be sold:	3004 S.E. 12 th Street, Unit 1072 Renton, WA 98058
Legal description of property to be sold:	Unit 1072, Building 12, Shadow Hawk I Condominium, Vol. 183, P. 87-95, King County
Parcel No.:	770157-0100-08
Sale price:	\$195,000.00, or such higher price as the parties agree to in order to close the short sale
Terms of sale:	Cash at Closing
Purchaser: Purchaser's address:	Andrew Patsalides, and/or assigns 10153 S.E. 192 nd Place Renton, WA 98055

**NOTICE OF MOTION FOR SALE OF
REAL PROPERTY OF THE ESTATE
FREE AND CLEAR OF LIENS AND
ENCUMBRANCES - 151124bNot Page 1**

THE LIVESEY LAW FIRM
600 Stewart Street, Suite 1908
Seattle, WA 98101
(206) 441-0826

Costs of sale:

The estate will pay the real estate agent a commission of 6% of the gross sales price or such lesser amount as the agents shall agree to; and, the estate will pay those costs of sale customarily paid by the Seller in Western Washington. These costs would include, but are not limited to, title insurance, real estate taxes due through the date of sale and one-half of the escrow costs.

Utility Liens

In many cases the existence of a utility lien and/or the amount of the lien is unknown until closing or thereafter. These liens usually, but not always, are equal to the utilities bills incurred over several months. These liens will be addressed at closing.

Encumbrances & approximate claim amounts:

- (1) Wells Fargo Bank, N.A. deed of trust - \$130,000; and
- (2) Boeing Employees Credit Union deed of trust - \$100,000.

Said sale will be free and clear of all liens and interests, said liens and interests to attach to the proceeds of the sale as though those proceeds were the property, said liens and interests to be satisfied from those proceeds. Notwithstanding the foregoing, the trustee requests the authority to pay the above named secured creditors, in the order of their liens to the extent funds are available.

This is a short sale. The sale is subject to the approval of Boeing Employees Credit Union, its servicers or agents ("BECU"). There will be insufficient funds to make a distribution to secured creditors of a lower priority than BECU. The trustee will negotiate the terms of the short sale with BECU; however, the terms of that sale are unknown at this time. The trustee will negotiate a buyer's premium/carve out of at least \$20,000. Of that amount, at least one half shall be disbursed to pre-petition unsecured creditors. If those creditors are paid in full, any remaining funds may be available for administrative expenses. Should the buyer be unable to close the sale, or should the trustee receive an offer she believes is better for the estate, the trustee reserves the right to, rather than treating the funds to the estate as a buyer's premium, negotiate a carve out with the secured creditor under Section 506(c) of the Bankruptcy Code.

The property was formerly the community property of the debtor and her late husband. He passed away in 2014. There was no probate. The trustee is working with the title company to provide the information needed to insure the proposed sale. The trustee is requesting authority to execute any additional documentation required by the title company.

The trustee employed a realtor to list and market the property. The proposed purchaser was secured through normal marketing procedures. Therefore, the trustee believes and therefore alleges that the purchaser is a good faith purchaser for value.

DATED this 24th day of November, 2015.

THE LIVESEY LAW FIRM

/S/ Rory C. Livesey

Rory C. Livesey, WSBA #17601
Of Attorneys for Trustee

**NOTICE OF MOTION FOR SALE OF
REAL PROPERTY OF THE ESTATE
FREE AND CLEAR OF LIENS AND
ENCUMBRANCES - 151124bNot Page 2**

THE LIVESEY LAW FIRM
600 Stewart Street, Suite 1908
Seattle, WA 98101
(206) 441-0826